

# WIGDOR LLP

ATTORNEYS AND COUNSELORS AT LAW

85 FIFTH AVENUE  
NEW YORK, NY 10003  
TEL 212.257.6800  
FAX 212.257.6845  
WWW.WIGDORLAW.COM

**Douglas H. Wigdor**  
[dwigdor@wigdorlaw.com](mailto:dwigdor@wigdorlaw.com)

March 4, 2022

## **VIA ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, New York 10007

Re: Flores v. The National Football League, et al.; Case No. 22 Civ. 00871 (VEC)

Dear Judge Caproni:

We represent Plaintiff Brian Flores and write jointly with Defendants National Football League, New York Football Giants, Inc., Miami Dolphins, Ltd. and Denver Broncos (together “Defendants”) to respectfully request an adjournment of the Rule 16(b) conference currently scheduled for March 18, 2022 to April 29, 2022 or such other date thereafter convenient for the Court. If acceptable to the Court, the parties propose to adjourn the pre-conference deadline to submit a joint letter and case management plan currently scheduled for March 10, 2022 to April 21, 2022 or 10 days before the Rule 16(b) conference. This is the first request for an extension of these deadlines.

The parties respectfully request this adjournment because Plaintiff has informed Defendants that he expects to file an Amended Complaint before the current deadline to respond, April 11, 2022, and the parties agree it would be a better use of resources for the parties to confer pursuant to Rule 26(f) and appear before the Court after the Amended Complaint is filed and after Defendants have had an opportunity to review the amended allegations and claims. Defendants also have requested, and Plaintiff has consented to, a 45-day period to respond to the Amended Complaint from the date of service, subject to the Court’s approval.

We thank the Court for its time and attention to this matter.

Respectfully submitted,



Douglas H. Wigdor